



**INVESTIGATION INTO THE ALLEGED DUMPING OF  
HOLLOW STRUCTURAL SECTIONS EXPORTED FROM THE  
KINGDOM OF THAILAND**

**RECORD OF MEETING**

***ANTI-DUMPING COMMISSION, SAHA THAI STEEL PIPE PUBLIC CO. and  
COMMERCIAL METALS (CMC)***

**Date:** Tuesday, 29 July 2014  
**Location:** Customs House  
1010 Latrobe Street Docklands VIC 3008  
9:30 am to 10.40am

**Attendees:**

Saha Thai  
Methita Rachrongmuang, CCO

Anti-Dumping Commission  
Bora Akdeniz, a/g Assistant Director  
Melanie Brandis, Assistant Director

Commercial Metals  
Darren Hicks, N. Marketing Manager  
Alexandra Streza

**Discussed:**

- Saha Thai Steel Pipe Public Co. (Saha Thai) and Commercial Metals Australia (CMC) requested a meeting with the Anti-Dumping Commission (the Commission) to enquire about the recently initiated HSS dumping duty investigation with a view to providing more accurate questionnaire responses.
- The Commission provided an overview of the investigation process and explained the investigative timeframes.
- The Commission explained cost to make and sell (CTMS) and general and administrative cost data as sought in the exporter questionnaire.
- The Commission clarified the relevance of generally accepted accounting principles and explained that the Commission will further verify reported data and check whether under or over absorption of costs are taking place.
- The Commission emphasised that all sales made to affiliated companies should be identified in the questionnaire response and explained that the Commission will evaluate each sales transaction and decide whether or not it was made in the ordinary course of trade and whether the transaction was arm's length.
- The goods description as it appears in the application was discussed.

## PUBLIC RECORD

- Saha Thai enquired about de minimis dumping margins. The Commission explained the legislative negligible dumping margins as per s.269TDA(6) of the *Customs Act 1901*.
- Saha Thai and CMC asked for clarification in terms of how the dumping duties would be implemented and whether or not each particular exporter would get its own margin. The Commission explained that, in general, a separate dumping margin will be calculated for each cooperating exporter and the non-cooperating exporters will get a different rate calculated by using all relevant information given that the aggregate volume of the dumped exports from the country of export exceed 3% of the total Australian import volume of the product during the investigation period.
- Finally, Saha Thai and CMC expressed their concerns about the goods description of the investigation and explained why they believe the goods description covers products that should not be the subject of this investigation. The Commission invited both parties to express their concerns by lodging formal submissions to the Commission.